

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

UNITED STATES OF AMERICA, <i>et al.</i> ,	)	No. 1:23-cv-10511-WGY
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
JETBLUE AIRWAYS CORPORATION and	)	
SPIRIT AIRLINES, INC.,	)	
	)	
Defendants.	)	
	)	

---

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, the undersigned attorney, Kaitlin Thompson, a member in good standing of the bar of this Court and whose appearance has been filed in this action on behalf of non-party Avelo Airlines, Inc. (“Avelo”), hereby moves that this Court enter an Order granting leave to Mark H. Hamer to appear *pro hac vice* on behalf of non-party Avelo in the above-captioned matter. Avelo has conferred with the Parties, who assent to this motion.

As set forth in the accompanying Certification, Mark H. Hamer certifies that (1) he is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; (3) he has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct; and (4) he has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

Dated: September 28, 2023

Respectfully submitted,

/s/ Kaitlin Thompson

Kaitlin Thompson (BBO #706745)

**Baker McKenzie LLP**

452 Fifth Avenue

New York, New York 10018

kaitlin.thompson@bakermckenzie.com

Tel: (212) 626-4100

Fax: (212) 310-1600

*Counsel for Non-Party Avelo Airlines, Inc.*

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that Avelo Airlines, Inc., through counsel, met and conferred in good faith with counsel for Defendants and counsel for Plaintiffs regarding the filing of this motion, and counsel does not oppose the requested relief.

*/s/ Kaitlin Thompson*  
Kaitlin Thompson

**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2023, I caused a true and correct copy of the foregoing to be served by CM/ECF to the parties registered to the Court's CM/ECF system.

*/s/ Kaitlin Thompson*  
Kaitlin Thompson